

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Annual Assessment of the Status of)	MB Docket No. 12-203
Competition in the Market for the)	
Delivery of Video Programming)	

**COMMENTS OF
SOUTH COAST COMMUNITY MEDIA ACCESS CENTER**

The South Coast Community Media Access Center (dba TV Santa Barbara) submits these comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

TV Santa Barbara (TVSB) provides community members with access to electronic media resources to facilitate public dialogue, free speech and participatory democracy; foster local creativity, education and culture, and reflect our diverse community. Through independent producer productions, staff-produced content, and programming provided by local organizations, TV Santa Barbara is providing a voice to the stories and people disenfranchised by major commercial media. This local programming is vital to southern Santa Barbara County residents and needs to be supported and carried in a manner consistent with commercial channels by all MVPD operators.

The region has one MVPD operator, Cox Communications. Cox provides seven (7) channels for PEG programming. Four (4) of those channels are for government programming

provided by the local municipalities in the MVPD's service area. One (1) channel is dedicated to public access programming, and two (2) channels are designated for educational programming.

TVSB operates two of these local PEG channels. TVSB -Voice provides an open and local community forum as an outlet for individuals with diverse viewpoints and for local nonprofits to share their stories and further their mission. Anyone in the community is able to use our resources to share their viewpoint in the electronic marketplace for a very minimal cost, which we feel is vital for an engaged and informed democracy to flourish. TVSB - Culture highlights the local arts and creative community and provides programming from local educational institutions. Programming on this channel provides a media outlet for the stories in our community that are often ignored in the mainstream media.

TVSB provides coverage of candidate debates for local elections, highlights of community events, one on one discussions with leaders in our local community, live studio call-in programs for residents to discuss their viewpoints, outreach programming from local churches, international news programming, local arts and culture programming, discussions on the economy, and more. This programming has included topics such as such as "Future Cars and Fuels", "The Weakest Link in Renewable Energy", "Unions: A Town Hall Meeting", and "Santa Barbara County Economic Outlook" with three Federal Reserve Bank Presidents. Nonprofits use our resources to provide coverage of their events, to increase their outreach and further support their missions. The local health department produces vital health programming in both English and Spanish in order to reach the local population. None of this programming would be possible without TV Santa Barbara and the carriage of the local PEG channels by Cox Communications.

All the PEG channels are carried on the basic tier of service. However, subscribers are required to have a television set with a digital tuner or a separate digital cable box to receive the PEG channels. All other channels on the basic service tier do not require this additional equipment. This has caused difficulty for subscribers to be able to access the channels, even though Cox Communications has offered to provide free cable boxes. Subscribers are often misinformed that there is a fee for the digital receiver boxes or are simply unaware of the steps they need to take to still receive these channels.

It is unfortunate that the PEG channels in our community have become less accessible to cable subscribers. As a result, viewers are not able to easily watch as their local elected officials make important decisions that affect their daily lives. Viewers are not able to listen to and engage in civic discourse with their neighbors, friends, and colleagues through the diversity of viewpoints shared on the public access channel. And viewers are missing out on educational and cultural programming that can enrich their lives and increase the outreach of area nonprofit organizations.

The PEG channels are not carried in HD by the cable provider. As HD becomes the standard for video programming, it is becoming increasingly important for PEG channels to be carried by Cox Communications in high-definition as well. With the cable system transitioning to an all digital system, the bandwidth requirements and restrictions should no longer be an issue that prevents the carriage of local community programming in HD.

Access to and inclusion in the digital program guide is a vital service and requirement for video programmers today. Cox Communications has provided TV Santa Barbara with the ability to have our programming included in the digital channel listings. The carriage of this information on the cable system is critical as more people use their cable-box DVR's to record

and time shift their viewing of programs. Without the digital listing, subscribers would be unable to record programming on the PEG channels on their DVR.

As a result of changes to state law, funding for the operation of TV Santa Barbara has decreased. As more of our service area transitions to the state franchising law in California, the non-profit community media center will continue to struggle with losses in funding. With new technology needs and increasing demand for services, the ability to adequately fund PEG programming is a challenge. Our goal is to keep costs low for independent producers and nonprofit organizations, so we are able to maintain a low barrier to entry for their stories to be told through electronic media.

Local PEG channels like TVSB Voice, TVSB Culture, and the local government channels are an invaluable resource to the local communities. The Commission needs to prevent industry practices from marginalizing or diminishing a community's access to the non-commercial local programming only available on PEG channels.

Respectfully submitted,



Matthew Schuster
Executive Director, TV Santa Barbara
329 S Salinas St
Santa Barbara, CA 93103
805-571-1721
matt@tvsb.tv

September 10, 2012

Date